

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: June 24, 2008
v.	:	CRIMINAL NO. 08-165
MYCHAEL SAUNDERS	:	VIOLATIONS:
BRANDON WOODSON	:	18 U.S.C. § 1951(a) (conspiracy to
ABU THOMAS	:	interfere with interstate commerce by
	:	robbery - 1 count)
	:	18 U.S.C. § 1951(a) (interference with
	:	interstate commerce by robbery
	:	- 1 count)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during a crime of violence
	:	- 1 count)
	:	18 U.S.C. § 3 (accessory after the fact
	:	- 2 counts)
	:	18 U.S.C. § 1512(b) (witness tampering
	:	- 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this superseding indictment:

1. The following businesses were engaged in interstate commerce:
 - a. C & C Sports Center located at 101 Geiger Road in Philadelphia,
Pennsylvania;
 - b. Pantry One Food Mart located at 185 East Plumstead Avenue in
Landsdowne, Pennsylvania;
 - c. Amici's Pizza located at 199 East Plumstead Avenue in
Landsdowne, Pennsylvania;

- d. Southside Pizza located at 5043 Wissahickon Avenue in Philadelphia, Pennsylvania;
- e. Crazy Greek Pizza located at 1999 ½ North 52nd Street in Philadelphia, Pennsylvania;
- f. The 7-Eleven convenience store located at 150 East Champlost Avenue in Philadelphia, Pennsylvania; and
- g. The Speed Wireless store located at 2907 North 22nd Street in Philadelphia, Pennsylvania.

2. From in about November, 2005 through in about January, 2006, in the Eastern District of Pennsylvania, defendants

**MYCHAEL SAUNDERS,
BRANDON WOODSON, and
ABU THOMAS**

conspired and agreed, together and other persons known and unknown to the grand jury, to commit robberies which would unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, in that defendants SAUNDERS, WOODSON, and THOMAS conspired with each other and others known and unknown to the grand jury to unlawfully take and obtain money and firearms from various businesses, including the businesses listed in paragraph one of this count, in the presence of the owners, customers, and/or employees of those businesses, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, in violation of Title 18, United States Code, Section 1951(a).

MANNER AND MEANS

It was part of this conspiracy that:

3. Defendant MYCHAEL SAUNDERS, Rashon Carter, who has been charged elsewhere, and Person #1, known to the grand jury ("Person #1) went to various businesses in Philadelphia, Pennsylvania and the surrounding area, entered the stores, held those inside the stores at gunpoint, threatened them with bodily injury if they did not cooperate, and stole money and other items from the stores.

4. In or about November, 2005, defendant BRANDON WOODSON, knowing that MYCHAEL SAUNDERS and Rashon Carter wanted to rob a gun store so they could acquire more and better guns to use in the commission of future robberies, introduced them to Person #1, a man defendant WOODSON knew also wanted to commit gun point robberies.

5. Defendant ABU THOMAS, who was aware that MYCHAEL SAUNDERS and Rashon Carter were committing gunpoint robberies and who knew in advance that defendant SAUNDERS and Rashon Carter were going to rob a gun store, stored guns and ammunition stolen during that robbery at his residence after the gun store robbery was completed on or about November 25, 2005, in an effort to decrease the chances that they would be confiscated by law enforcement authorities and for use in other robberies by the coconspirators.

OVERT ACTS

In furtherance of the conspiracy, in the Eastern District of Pennsylvania, defendants MYCHAEL SAUNDERS, BRANDON WOODSON, and ABU THOMAS, and others known and unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

The Initial Robberies

On or about November 11, 2005:

1. Defendant MYCHAEL SAUNDERS and Rashon Carter committed a gunpoint robbery of the Pantry One Food Mart, located at 185 East Plumstead Avenue in Landsdowne, Pennsylvania, during which they stole money.

On or about November 16, 2005:

2. Defendant MYCHAEL SAUNDERS and Rashon Carter committed a gunpoint robbery of Amici's Pizza, located at 199 East Plumstead Avenue in Landsdowne, Pennsylvania, during which they stole money.

On or about November 20, 2005:

3. Defendant MYCHAEL SAUNDERS and Rashon Carter committed a gunpoint robbery of Southside Pizza, located at 5043 Wissahickon Avenue in Philadelphia, Pennsylvania, during which they stole money.

The C & C Sports Center Robbery

In or about November, 2005:

4. Defendant MYCHAEL SAUNDERS and Rashon Carter decided to rob a gun store.

5. Defendant BRANDON WOODSON, knowing that defendant MYCHAEL SAUNDERS and Rashon Carter intended to rob a gun store, introduced them to Person #1, who defendant WOODSON knew also wanted to commit gun point robberies. Defendant WOODSON drove defendant SAUNDERS and Carter to where Person #1 lived so they could all meet and discuss their robbery plans.

On or about November 25, 2005:

6. Defendant MYCHAEL SAUNDERS, Rashon Carter, and Person #1 drove together in a borrowed car to C & C Sports Center, located at 101 Geiger Road in Philadelphia, Pennsylvania.

7. Defendant MYCHAEL SAUNDERS, Rashon Carter, and Person #1 barged into the store and held the owner and customers at gunpoint, while threatening to kill them if they did not cooperate.

8. Defendant MYCHAEL SAUNDERS, Rashon Carter, and Person #1 stole money from the store's register and from the owner's person.

9. Defendant MYCHAEL SAUNDERS, Rashon Carter, and Person #1 smashed the glass display cases in the store and stole firearms, firearm clips, and ammunition from the store.

10. Defendant MYCHAEL SAUNDERS, Rashon Carter, and Person #1 then fled from the store and escaped with stolen guns and ammunition in the borrowed car.

11. Following the robbery, defendant MYCHAEL SAUNDERS, Rashon Carter, Person #1, ABU THOMAS, and Person #2 known to the grand jury ("Person #2"), gathered together to discuss the robbery and to divide the proceeds from the robbery.

12. After the proceeds from the robbery were divided, defendant ABU THOMAS stored guns and ammunition that were stolen during the robbery at his residence in Philadelphia.

From November 25, 2005 through in or about January, 2006:

13. Defendant ABU THOMAS stored guns and ammunition that had been stolen from C & C Sports Center on or about November 25, 2005 at his residence in Philadelphia, for use by defendant MYCHAEL SAUNDERS, Rashon Carter, and others known and unknown to the grand jury, in other robberies. Defendant THOMAS also harbored Rashon Carter at his residence in Philadelphia.

14. Defendant MYCHAEL SAUNDERS and Rashon Carter used some of the guns that were stolen from C & C Sports Center on or about November 25, 2005, some of which were stored by defendant ABU THOMAS, to commit additional robberies.

The Later Robberies

On or about January 3, 2006:

15. Defendant MYCHAEL SAUNDERS and Rashon Carter committed a gunpoint robbery of Crazy Greek Pizza, located at 1999 ½ North 52nd Street in Philadelphia, Pennsylvania, during which they used one or more of the guns stolen during the C & C Sports Center robbery.

On or about January 6, 2006:

16. Defendant MYCHAEL SAUNDERS and Rashon Carter committed a gunpoint robbery of Amici's Pizza, located at 199 East Plumstead Avenue in Landsdowne, Pennsylvania, during which they used one or more of the guns stolen during the C & C Sports Center robbery.

On or about January 7, 2006:

17. Defendant MYCHAEL SAUNDERS and Rashon Carter committed a gunpoint robbery of a 7-Eleven convenience store, located at 150 East Champlost Avenue, Philadelphia, Pennsylvania, during which they used one or more of the guns stolen during the C & C Sports Center robbery.

18. During the 7-Eleven, robbery defendant MYCHAEL SAUNDERS shot and wounded a man who confronted him inside the store.

On or about January 20, 2006:

19. Rashon Carter committed a gunpoint robbery of the Speed Wireless store, located at 2907 North 22nd Street in Philadelphia, Pennsylvania, during which he used a gun stolen during the C & C Sports Center robbery.

On or about January 21, 2006:

20. Rashon Carter committed a gunpoint robbery of the Speed Wireless store, located at 2907 North 22nd Street in Philadelphia, Pennsylvania, during which he used a gun stolen during the C & C Sports Center robbery.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1(a) and 3 through 5, and Overt Acts 4 through 11 of Count One of this superseding indictment are incorporated here.

2. On or about November 25, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MYCHAEEL SAUNDERS and
BRANDON WOODSON**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendant MYCHAEEL SAUNDERS, defendant BRANDON WOODSON, Rashon Carter, and others unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, money, firearms, and ammunition, from C & C Sports Center located at 101 Geiger Road in Philadelphia, Pennsylvania, in the presence of the owner and customers of C & C Sports Center and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the owner and customers of C & C Sports Center, by pointing a firearm at, demanding money from, and otherwise threatening them.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On or about November 25, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

MYCHAEL SAUNDERS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

1. Paragraph 1(a) and Overt Acts 4 through 13 of Count One of this superseding indictment are incorporated here.
2. Following the commission of the armed robbery by Mychael Saunders and Rashon Carter of the C & C Sports Center on or about November 25, 2005, defendant ABU THOMAS stored firearms and ammunition stolen during the robbery inside his residence and allowed Rashon Carter to stay in his residence to avoid detection and apprehension by law enforcement.
3. From on or about November 25, 2005 through on or about January 22, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ABU THOMAS,

knowing that Rashon Carter had committed an offense against the United States, that is, the Hobbs Act robbery of C & C Sports Center on or about November 25, 2005, in violation of Title 18, United States Code, Section 1951(a), as described in Count Two of this superseding indictment, received, relieved, comforted, and assisted Rashon Carter in order to hinder and prevent Carter's apprehension, trial, and punishment.

In violation of Title 18, United States Code, Section 3.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

1. On or about January 22, 2006, Rashon Carter was arrested and charged with the commission of two gun point robberies of the Speed Wireless Store, located at 2907 North 22nd Street in Philadelphia, Pennsylvania, on or about January 21, 2006 and January 22, 2006.

2. Rashon Carter was released on bail pending trial of these matters, but he failed to appear at a required court listing on or about July 31, 2006. A bench warrant was issued for Carter's arrest, and he became a fugitive.

3. While Rashon Carter was a fugitive, defendant ABU THOMAS allowed Carter to stay at his residence to avoid detection and apprehension by law enforcement.

4. From on or about July 31, 2006 through on or about November 30, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ABU THOMAS,

knowing that Rashon Carter had committed an offense against the United States, that is, the Hobbs Act robberies of the Speed Wireless Store on January 21, 2006 and January 22, 2006, in violation of Title 18, United States Code, Section 1951(a), and knowing that Carter was a fugitive, received, relieved, comforted, and assisted Rashon Carter in order to hinder and prevent his apprehension, trial, and punishment by harboring Carter while he was a fugitive.

In violation of Title 18, United States Code, Section 3.

COUNT SIX

Witness Tampering

THE GRAND JURY FURTHER CHARGES THAT:

1. Defendant MYCHAEL SAUNDERS was arrested on February 22, 2008 and charged by complaint with having violated 18 U.S.C. §§ 1951 and 924(c)(1)(A) for his part in the robbery of the C & C Sports Center on or about November 25, 2005, as described in Counts One through Three of this superseding indictment.

2. Following a hearing on February 29, 2008, a United States Magistrate Judge ordered that MYCHAEL SAUNDERS could be released on bail once sufficient collateral was posted on his behalf.

3. On or about March 2, 2008, while MYCHAEL SAUNDERS was in temporary custody at the Federal Detention Center pending release on bail, he confronted Rashon Carter, whom he believed had provided the government with information that led to his arrest. Specifically, in an effort to intimidate Carter and to persuade him to discontinue any cooperation with the government and to refuse to testify in any further proceedings, defendant SAUNDERS threatened to harm Carter's family when defendant SAUNDERS was released on bail.

4. On or about March 2, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

MYCHAEL SAUNDERS

knowingly intimidated, threatened, and corruptly persuaded another person, Rashon Carter, a federal witness, and attempted to intimidate, threaten, and corruptly persuade Carter, with intent to influence, delay, and prevent Carter's testimony in an official proceeding relating to the

commission or possible commission of a federal offense, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, and knowingly using and carrying a firearm, during and in relation to conspiracy to interfere with commerce by robbery and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

In violation of Title 18, United States Code, Section 1512(b)(1).

_____ **A TRUE BILL:**

_____ **GRAND JURY FOREPERSON**

PATRICK L. MEEHAN
UNITED STATES ATTORNEY_____